

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF DELAWARE

SECURITIES AND EXCHANGE
COMMISSION,

Plaintiff

v.

C.A. No. 1:15-cv-00363-RGA

DAVID R. GIBSON,
ROBERT V.A. HARRA, JR.
WILLIAM B. NORTH and
KEVYN N. RAKOWSKI

Defendants

UNOPPOSED MOTION FOR A STAY OF THE CIVIL ACTION

COME NOW Defendants, David R. Gibson, Robert V.A. Harra, Jr., William B. North and Kevyn N. Rakowski (collectively “Defendants”), by and through its attorneys, hereby respectfully move the Court for an Order granting a stay of the instant civil action pending resolution of the pending criminal action, *United States v. William B. North, et al.*, Crim. No. 15-23-RGA. The grounds for this motion are fully set forth in Memorandum of Law in Support of Defendants’ Joint Motion to Stay served and filed contemporaneously herewith.

OF COUNSEL:

DALTON & ASSOCIATES, P.A.

KROVATIN KLINGEMAN LLC
Henry E. Klingeman
Helen A. Nau
60 Park Place, St. 1100
Newark, NJ 07102
Phone: (973) 424-9777
hklingeman@krovatin.com
hnaud@krovatin.com

By: /s/ Bartholomew J. Dalton
Bartholomew J. Dalton (DE #808)
Andrew Caulfield Dalton (DE #5878)
Cool Spring Meeting House
1106 West 10th Street
Wilmington, DE 19806
Phone: (302) 652-2050
Fax: (302) 652-0687
bdalton@bdaltonlaw.com
adaulton@bdaltonlaw.com

Attorneys for Defendant Kevyn N. Rakowski

OF COUNSEL:

PAUL HASTINGS LLP

Kenneth M. Breen
John P. Nowak
Phara A. Guberman
75 East 55th Street
New York, NY 10022
Phone: (212) 318-63344
kennethbreen@paulhastings.com
johnnowak@paulhastings.com
pharaguberman@paulhastings.com

**MORRIS, NICHOLS, ARSHT &
TUNNELL LLP**

By: /s/ William M . Lafferty
William M. Lafferty (DE #2755)
1201 North Market Street
Wilmington, DE 19801
Phone: (302) 351-9341
Fax: (302) 425-4679
wlaflattery@mnat.com

Attorneys for Defendant David R. Gibson

OF COUNSEL:

ANDREW M. LAWLER, P.C.
Andrew M. Lawler
Sharon D. Feldman
641 Lexington Avenue, 27th Floor
New York, NY 10022
Phone: (212) 832-3160
alawler@amlpc.com
sfeldman@amlpc.com

McCARTER & ENGLISH, LLP

By: /s/ Michael P. Kelly
Michael P. Kelly (DE #2295)
Andrew S. Dupre (DE #4621)
Daniel J. Brown (DE #4688)
Renaissance Centre
405 N. King Street, 8th Floor
Wilmington, DE 19801
Phone: (302) 984-6328
Fax: (302) 984-6300
mkelley@mccarter.com
adupre@mccarter.com
djbrown@mccarter.com

Attorneys for Defendant Robert V.A. Harra, Jr.

WILKS, LUKOFF & BRACEGIRDLE, LLC

By: /s/ David E. Wilks
David E. Wilks (DE #2793)
1300 North Grant Ave., St.100
Wilmington, DE 19806
Phone: (302) 225-0858
Fax: (302) 255-0859
dwilks@wlblaw.com

Attorneys for Defendant William B. North

Dated: June 19, 2015

CERTIFICATION PURSUANT TO LOCAL RULE 7.1.1

Pursuant to Local Rule 7.1.1, counsel for defendant Kevyn N. Rakowski, has consulted with counsel for the Plaintiff and the Defendants. Plaintiff Securities and Exchange Commission does not oppose this motion. All Defendants consent to and join in this motion.

OF COUNSEL:

KROVATIN KLINGEMAN LLC

Henry E. Klingeman
Helen A. Nau
60 Park Place, St. 1100
Newark, NJ 07102
Phone: (973) 424-9777
hklingeman@krovatin.com
hnaau@krovatin.com

DALTON & ASSOCIATES, P.A.

By: /s/ Bartholomew J. Dalton
Bartholomew J. Dalton (DE #808)
Andrew Caulfield Dalton (DE #5878)
Cool Spring Meeting House
1106 West 10th Street
Wilmington, DE 19806
Phone: (302) 652-2050
Fax: (302) 652-0687
bdalton@bdaltonlaw.com
adaulton@bdaltonlaw.com

Attorneys for Defendant Kevyn N. Rakowski

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

SECURITIES AND EXCHANGE COMMISSION,	:	
	:	
Plaintiff	:	
	:	
v.	:	Civil Action No. 1:15-cv-00363-RGA
	:	
DAVID R. GIBSON,	:	
ROBERT V.A. HARRA, JR.	:	
WILLIAM B. NORTH and	:	
KEVYN N. RAKOWSKI	:	
	:	
Defendants	:	

PROPOSED ORDER

HAVING CONSIDERED Defendants' Unopposed Motion for Stay of the Civil Action, and any response thereto, **IT IS HEREBY ORDERED** that the Motion is **GRANTED** and the matter is stayed pending resolution of the criminal action *United States v. William B. North, et al.*, Crim. No. 15-23-RGA.

HONORABLE RICHARD G. ANDREWS
United States District Judge